



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY KANSAS 66101

February 19 2002

A717

Site	Herculaneum Lead
ID #	mpcrls246393
Break	20
Other	2-19-02

cm

James M Lanzafame  
The Doe Run Company  
81 Main Street  
Herculaneum MO 63048

Dear Mr Lanzafame

RE January Draft Smelter Transportation and Materials Handling Plan  
Herculaneum-Lead Smelter Site Herculaneum Missouri

The following are the United States Environmental Protection Agency's comments on the subject document

Page 6 Railroad Material Movement

- 1 A detailed description of rail car cleaning should be provided It should include but not be limited to labor and equipment used for cleaning handling and disposal of cleanings personnel protective gear used dust suppression measures used during rail car cleaning as well as dumping and excavating and cleanup confirmation procedures
- 2 A start date for rail service should be provided

Page 8 Barge Material Movement

- 1 A detailed description of spill prevention and cleanup should be provided It should describe the measures taken to prevent spillage during excavating dust control procedures barge and dock cleaning procedures handling and disposal of cleanings, and contingency measures for large spills and releases to the river

Page 9 Truck Material Movement

- 1 A detailed description of truck and unloading station cleaning should be provided It should include but not be limited to labor and equipment used for cleaning handling and disposal of cleanings and spillage personnel protective gear used for cleaning dust suppression measures used during cleaning and unloading and cleanup confirmation procedures
- 2 Dust control measures and cleanup procedures for days when the temperature is below 35 F should be identified and described
- 3 The Plan should identify the measures taken to prevent releases from the trucks as they travel to and from the facility The Plan should identify all street cleaning procedures and cleanup confirmation protocols Enclosed are sampling results that indicate current materials handling and street cleaning

40173008



SUPERFUND RECORDS

procedures are inadequate in maintaining haul road lead concentrations at levels that are protective of public health and the environment. This Plan should identify best available technology for transporting lead bearing materials and cleaning streets. The Plan should select and recommend best available technologies to address these currently documented materials handling inadequacies at the Herculaneum Facility.

4 Internal facility roads should be sealed and routinely cleaned using best available technology

#### Page 10 Refinery Dock Procedures

1 A detailed description of dock inspection and cleaning procedures should be provided. At a minimum it should include labor and equipment used for cleaning, handling and disposal of cleanings and spillage, personnel protective gear used for cleaning, dust suppression measures used during cleaning and loading and cleanup confirmation procedures.

#### Page 12 21 In Plant Material Management

1 The Plan should indicate whether the handling and storage of these materials is inside or outside the smelter facility buildings. Diagrams would also be helpful. The Plan should at a minimum provide details of all procedures used for dust control, storage facility containment, spill cleanup procedures and contingency plans for releases.

2 This Plan should include details on the measures to be implemented to prevent releases of slag while loading, unloading and transporting slag to the slag storage area. At a minimum the Plan should include labor and equipment used for the handling of slag, spill cleanup procedures, personnel protective gear used for spill response, dust suppression measures used during cleanup, loading and unloading and cleanup confirmation procedures. The Plan should also acknowledge that a detailed assessment of the risks posed by the slag storage area/pile along with a selected removal remedy is forthcoming in future documents to be developed under an Administrative Order on Consent (Docket No. CERCLA 7 2000 0029/RCRA 7 2000 0018).

3 The Plan should include details for handling concentrate feed/materials. At a minimum the Plan should include dust control apparatus and procedures, containment specifications at storage areas, contingency plans and spill cleanup procedures.

#### General Comments

1 This Plan fails to address concentrate spillage prevention and cleanup along haul roads. This problem has been clearly documented and is the primary reason for requiring this Plan in the most recent Administrative Order. Enclosed is a compilation of dust and air monitoring data collected at stations along concentrate truck delivery routes. This data indicates that the current transportation and street cleaning procedures are ineffective. Regardless of whether a new road is constructed for truck traffic to the facility, spillage must be eliminated and adequate cleanup procedures identified. EPA's mission is to protect the environment as well as public health. Recent air monitoring and street sampling data indicate that the current street cleaning and delivery truck procedures do not sufficiently reduce lead concentrations in and along roadways in Herculaneum. This Plan needs to be revised to include details on transportation and street cleaning procedures that will result in a reduction of lead concentrations in the street to levels that are protective of public health and the environment.

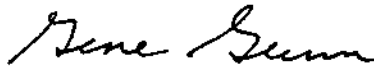
2 Overall this Plan is entirely inadequate and lacks any detail that would indicate what is being done to prevent releases from the facility and trucks delivering materials to the facility. The Plan is also lacking any specifics for actions that would be taken to respond to releases from the facility and delivery trucks. Best management practices that include the incorporation of best available technology need to be utilized at this facility and must be identified in this Plan.

3 In providing your revisions to this Plan, all the options for consideration to address the prevention of releases and cleanup of spillage should be identified in the Plan and their advantages and disadvantages described.

4 The Doe Run Company should realize that the phases, best management practices, and to the extent practicable, does not restrict the company from using all the equipment and technology currently available to meet the objectives of this Plan. Best available technology needs to be incorporated into this facility's materials handling procedures. Where possible, loading and unloading stations should be enclosed. Where enclosures are not possible, wet spray/sprinkler systems should be utilized on concentrates and dust-producing materials. Trucks and storage areas should be covered and sealed. Augers and conveyor belts should be enclosed.

In accordance with the Administrative Order (Docket No. 07-2002-0038), the resubmittal of the Plan is due 20 working days from receipt of these comments. EPA is very concerned about the lack of attention given to this very critical issue concerning your Herculaneum Facility and would like to meet with you as soon as possible or no later than seven days from the date of this letter. I can be reached at (913) 551-7755 to schedule this meeting.

Sincerely,



Bruce A. Morrison  
Superfund Project Manager  
Superfund Division

cc Dave Mosby MDNR  
Aaron Miller DRC  
Dan Vornberg DRC  
Jeffery Zelms DRC  
Lou Maricheau DRC  
Dave Cozad CNSL  
Jim Silver ER&R